

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

Case No.: 1:22-cv-1032 (PKC)(JRC)

-against-

DECLARATION OF
ANTHONY INFURNA

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

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ANTHONY INFURNA, hereby declares and verifies the truth of the following,
under penalty of perjury under the laws of the United States of America, pursuant to Title 28,
United States Code, Section 1746:

1. I am the office manager for The Gucciardo Law Firm, PLLC (the “Gucciardo Firm”), which represents Kiera Cohen in *Cohen v. Salvatore Micleotta*, Nassau County Clerk’s Index No. 602851/2022, and I am fully familiar with the facts set forth herein
2. I submit this declaration at the behest of defendants Safa Gelardi, Vito Gelardi and IME Companions LLC (collectively, “Defendants”).
3. I have been advised by Defendants’ counsel that Defendants have been accused of committing contempt of Court by having Tiffany Uribe, as an agent of IME Companions LLC, appear on the Gucciardo Firm’s behalf at an Independent Medical Examination (“IME”) of Kiera Cohen by a defense expert on April 20, 2023.
4. The Gucciardo Firm has no record showing that IME Companions LLC, its agents and/or employees, appeared at Kiera Cohen’s IME on April 20, 2023. The Gucciardo Firm

has no record of receiving any report from IME Companions LLC, its agents and/or employees, pertaining to Kiera Cohen's IME of April 20, 2023. The Gucciardo Firm has no record of paying IME Companions LLC, its agents and/or employees, for appearing on April 20, 2023. The Gucciardo Firm has no record of being invoiced by IME Companions LLC, its agents and/or employees, for appearing on April 20, 2023.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 8, 2024



ANTHONY INFURNA